AFFIDAVIT

Affiant Paul D. Stroney Jr., having been duly sworn according to law, deposes and states:

Affiant Paul D. Stroney Jr., is an employee of the United States Department of Justice (DOJ), Drug Enforcement Administration (DEA), within the meaning of Section 878(a) of Title 21, United States Code, that is, an officer who is empowered by law to conduct investigations, make arrests, execute search warrants, and seize property in connection with violations of Title 18, United States Code and Title 21, United States Code. Affiant is a Special Agent (SA) for the DEA, and has been so employed since February 2012. Affiant has been assigned to the Cleveland District Office in Cleveland, Ohio, since February 2012.

TRAINING AND EXPERIENCE

1. Affiant received specialized training at the DEA Training Academy in Quantico, Virginia, regarding the identification of narcotic controlled substances and the operation of drug trafficking organizations. Affiant has also been involved in the investigation of numerous individuals and organizations involved in the manufacturing, distribution, and use of controlled substances. As a Special Agent, Affiant has also worked in an undercover capacity for the purpose of purchasing controlled substances, and has participated in the preparation of affidavits in support of numerous search and arrest warrants for violations of federal drug laws contained in Title 21, United States Code, as well as in the execution of the same. In addition, Affiant has on numerous occasions, made seizures of contraband, conveyances, currency, drug paraphernalia, and firearms possessed or used in relation to violations of Title 21, United States Code, Section 841. Affiant has successfully conducted numerous investigations that have resulted in the arrest of numerous drug traffickers and the seizure of significant quantities of

drugs and drug-related proceeds. Affiant has further conducted surveillance operations of drug traffickers, and has interviewed numerous persons personally involved in drug trafficking. Affiant has also supervised numerous confidential sources during controlled purchases of narcotics. Through this training and experience, Affiant has become familiar with, and has gained a thorough understanding of, the methods, manner, and means used by individuals engaged in the unlawful manufacturing, trafficking, and use of controlled substances.

BASIS OF INFORMATION

- 2. Except as otherwise noted, the information set forth in this Affidavit has been provided to your Affiant by agents and/or officers of the Drug Enforcement Administration (DEA) or other law enforcement officers. Unless otherwise noted, whenever in this Affidavit your Affiant asserts that a statement was made, the information was provided by another law enforcement officer (who may have had either direct or hearsay knowledge of the statement) to whom Affiant has spoken or whose report Affiant has read and reviewed. Likewise, any information pertaining to vehicles and/or registrations, personal data on subjects and record checks has been obtained through the Law Enforcement Automated Data System (LEADS), the State of Ohio or the National Crime Information Center (NCIC), the Ohio Law Enforcement Gateway (OHLEG) computer system, and other known public database computer systems, by members herein described.
- 3. Since the Affidavit is being submitted for the limited purpose of securing an arrest warrant, your Affiant has not included each and every fact known to him concerning this investigation. Your Affiant has set forth only the facts that he believes are necessary to establish the foundation for the issuance of the arrest warrant.
 - 4. This affidavit is offered in support of the issuance of a complaint and arrest

warrant for Tareef CHANEY, Jesus Miguel PEREZ-GUICHO, and Carlos Alberto VALENZUELA-SANCHEZ for violations of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A), that is Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances.

FACTS AND CIRCUMSTANCES REGARDING PROBABLE CAUSE

- 5. On August 10, 2022, investigators with the Drug Enforcement Administration and Beachwood Police Department were conducting surveillance in the area of the Clarion Hotel, located at 26300 Chagrin Blvd., Beachwood, OH. At approximately 12:03 p.m., DEA Task Force Officer Luke Combs observed a maroon Honda Accord, displaying Ohio registration EUH8653, arrive near the entrance of the hotel. A short time later, Jesus Miguel PEREZ-GUICHO and VALENZUELA-SANCHEZ exited the hotel and began attempting to load their luggage into the aforementioned Honda Accord. Investigators observed PEREZ-GUICHO and VALENZUELA-SANCHEZ struggling to fit all the luggage in the vehicle. At approximately 12:15 p.m., DEA TFO Jose Alcantara observed the driver of the Honda (who was later identified as Tareef CHANEY), hand his cellphone to PEREZ-GUICHO as they continued to load luggage into the vehicle. At approximately 12:19 p.m., after the luggage was loaded into the vehicle, the trunk of the Honda Accord was closed and Tareef CHANEY returned to the driver's seat of the vehicle.
- 6. Approximately two minutes later, CHANEY departed while driving the Honda Accord containing the luggage. CHANEY drove southbound on Park East Boulevard from the parking lot. With the assistance of Beachwood Police Department and the Ohio State Highway Patrol, investigators observed CHANEY violate the following traffic violations: Marked Lanes, Beyond a Stop Line and Stop Sign Violation. At approximately 12:25 p.m., a uniformed Beachwood Police Department Officer conducted a traffic stop of the Honda Accord on

Richmond Road near 3850 Richmond Road, Beachwood, Ohio. Tareef CHANEY was identified as the driver and sole adult occupant of the Honda Accord. CHANEY had two children in the vehicle with him.

- 7. A Beachwood Police Department Officer utilized K9 "Kai" to conduct an open-air sniff of the Honda Accord. K9 "Kai" positively alerted to the presence of the odor of controlled substances on the driver's side of the Honda Accord. Law enforcement then conducted a probable cause search of the vehicle and seized three kilogram-sized bricks of compressed white powder and various other suspected narcotics, an undetermined amount of United States Currency, packaging materials, a money counter, ledger, miscellaneous documents and receipts, and cellular telephones. The kilogram-sized bricks were concealed inside a blue duffel bag. At the scene of the traffic stop, CHANEY stated he had been paid \$500 to transport the luggage for another person.
- 8. On August 10, 2022, at approximately 12:40 p.m., investigators observed a black sedan, later identified to be a legitimate Uber vehicle, arrive at the Clarion Hotel located at 26300 Chagrin Blvd., Beachwood, Ohio. Jesus Miguel PEREZ-GUICHO and Carlos Alberto VALENZUELA-SANCHEZ entered the backseat of the vehicle. Once investigators confirmed suspected narcotics were found during the traffic stop of CHANEY's vehicle, investigators approached and arrested PEREZ-GUICHO and VALENZUELA-SANCHEZ before they could depart in the Uber ride. Investigators seized three cellular telephones from PEREZ-GUICHO and VALENZUELA-SANCHEZ. PEREZ-GUICHO had a Mexican Voter identification card listing his date of birth as 09/10/1978 and his residential address in Culiacan, Sinaloa. VALENZUELA-SANCHEZ had a Mexican Voter identification card listing his date of birth as 08/12/1989 and his residential address in Culiacan, Sinaloa.

- 9. Jesus Miguel PEREZ-GUICHO, Carlos Alberto VALENZUELA-SANCHEZ, and Tareef CHANEY were transported to Beachwood City Jail without incident. TFO Jose Alcantara and DEA Special Agent Kris White (telephonically with Affiant) conducted post-Miranda interviews of PEREZ-GUICHO and VALENZUELA-SANCHEZ. DEA TFO Ashley Tate, DEA TFO Jason Glover and Beachwood PD Patrolman Jake Bertone conducted a post-Miranda interview with Tareef CHANEY. CHANEY stated he had just met PEREZ-GUICHO and VALENZUELA-SANCHEZ. CHANEY explained that he is an informal rideshare driver, and he had just received contact information for PEREZ-GUICHO and VALENZUELA-SANCHEZ from a fellow rideshare driver. CHANEY stated he didn't really know PEREZ-GUICHO nor VALENZUELA-SANCHEZ, and he was only transporting their luggage for them in exchange for \$30. It should be noted that during the initial traffic stop, CHANEY advised the Beachwood Officer that he was being paid \$500 to transport the luggage.
- 10. During a post-Miranda interview, PEREZ-GUICHO claimed ownership of the black suitcases located in CHANEY's vehicle. Further, PEREZ-GUICHO claimed ownership of the monies found within those suitcases but did not provide information as to how the money was obtained or what it was for. PEREZ-GUICHO and VALENZUELA-SANCHEZ provided consent for investigators to search their cellphones. PEREZ-GUICHO and VALENZUELA-SANCHEZ both claimed they had been in Ohio for approximately one month. PEREZ-GUICHO, VALENZUELA-SANCHEZ and CHANEY were then conveyed to the Cuyahoga County Jail for a courtesy hold.
- 11. During a consensual search of PEREZ-GUICHO's cellular telephone, TFO Jesse Bynum found a photograph taken of another cell phone's screen. The second cell phone was displaying a translation between Spanish and English of the following statement, "It's under my

fake iD name chaney then the room number is 251." The filename of the photograph indicated it was generated on July 31, 2022. In the reflection of the photographed phone's screen, VALENZUELA-SANCHEZ'S face and another raised phone was visible. In summary, it appeared that VALENZUELA-SANCHEZ used his telephone to photograph the translated message, and then sent that photograph to PEREZ-GUICHO's phone.

- 12. During the search of one of Tareef CHANEY's phones, investigators found the following messages between CHANEY and a person using telephone number (440) 530-5364 on Tuesday, August 9, 2022. At approximately 11:13 a.m., the user of (440) 530-5364 stated, "You can rent another room for today and we'll rent the Airbnb from tomorrow until the 18th." At 11:29 a.m., CHANEY replied, "Ok." At 12:43 p.m., the user of (440) 530-5364 stated, "Nephew, I need the complete address for the Maple spot. They're ready to send the shoes, but they say the zip code is'nt matching." At 1:11 p.m., the user of (440) 530-5364 sent another message with a link that appeared to correspond to an AirBnB. At 1:30 p.m., CHANEY replied with the address of a residence in Maple Heights, Ohio. Affiant is also aware that "shoes" is a common slang term for narcotics. Affiant is also aware that drug traffickers often use the U.S. Postal Service, FedEx, or UPS to transport narcotics. Affiant believes that in the preceding conversation, the third party using (440) 530-5364 was advising CHANEY that another person was going to send narcotics through a parcel service, but they needed a complete address with the correct ZIP code.
- 13. On Tuesday, August 9, 2022, at 4:39 p.m., the user of (440) 530-5364 sent a message to CHANEY that stated, "Grab the bread from our friends at the hotel." On August 9, 2022, at 4:42 p.m., the user of (440) 530-5364 sent a message to telephone number (216) 926-3805, which was recovered from GUICHO-PEREZ and consensually searched. The message stated, "Ya arreglé la Airbnb pero ocupo 1,400 para pagar la renta por lo tanto a ti para recoger

los 1,400. Va a llegar de dentro una hora." This message meant the user of (440) 530-5364 already arranged the Airbnb but needed 1,400 in order to pay the rent and someone would arrive within an hour to recover the \$1,400." On August 9, 2022, at 8:38 p.m., Tareef CHANEY sent a message to telephone number (216) 926-3805, which was recovered from GUICHO-PEREZ. The message stated, "Hey I'm outside bring me the money for the Airbnb." Based on the above messages, which were exchanged via WhatsApp, Affiant believes the user of (440) 530-5364 was directing Tareef CHANEY to collect \$1,400 from GUICHO-PEREZ so that he could pay for an AirBnB for them to move to. Affiant is aware, based on training and experience, that sophisticated drug traffickers frequently utilize AirBnB residences for receiving and temporarily storing drugs and/or drug proceeds. Based on the message between the user of (440) 530-5364 and CHANEY regarding "shoes," Affiant believes the user of (440) 530-5364 and CHANEY planned to receive another shipment of narcotics within a few days.

14. On August 11, 2022, the Cuyahoga County Regional Forensic Science Laboratory conducted a presumptive test of one of the three kilogram-sized bricks seized from Tareef CHANEY's vehicle. The presumptive test indicated the brick was 991.75 grams of a substance containing fentanyl, 4-ANPP, and Fluorofentanyl.

CONCLUSION

- 15. Special Agent Paul Stroney, Drug Enforcement Administration, being duly sworn according to law, deposes, and states that the facts stated in the foregoing Affidavit are true and correct to the best of his knowledge, information, and belief.
- 16. Affiant is aware, based on training and experience, that sophisticated drug traffickers often employ third parties to transport drugs, money, and register assets (such as vehicles, houses, or hotel rooms) in an effort to insulate themselves from criminal liability. It should be noted that Tareef CHANEY resides in Ohio, while PEREZ-GUICHO and

VALENZUELA-SANCHEZ both had identification cards listing their residences as being located in Culiacan, Sinaloa, Mexico. It should be noted that Sinaloa is the home territory of the Sinaloa Cartel. The various factions of the Sinaloa Cartel still represent some of the most prolific drug trafficking organizations in the world. Based on the quantity of narcotics and the money counter found in CHANEY's car, Affiant believes PEREZ-GUICHO and VALENZUELA-SANCHEZ came to the Northern District of Ohio to facilitate the distribution of narcotics and the collection of drug proceeds. Affiant believes they are sophisticated drug traffickers who employed Tareef CHANEY to obtain a hotel room for them, and then used him to transport their narcotics and other implements of narcotics trafficking.

17. Based on your Affiant's training, experience and the facts set forth in this Affidavit, your Affiant believes that there is probable cause to believe that Tareef CHANEY, Jesus Miguel PEREZ-GUICHO, and Carlos Alberto VALENZUELA-SANCHEZ did engage in Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances, in violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A).

Paul D. Stroney Jr.

Special Agent

Drug Enforcement Administration

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Sworn to via telephone after submission by reliable electronic means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker

United States Magistrate Judge

10:50 AM, Aug 12, 2022